

## Office of the Chapter 13 Standing Trustee

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March 11, 2025

The Honorable Jerrold N. Poslusny, Jr.  
United States Bankruptcy Court  
P.O. Box 2067  
Camden, New Jersey 08102

RE: Chapter 13 Bankruptcy  
Debtor(s) Name: Anthony J. Dinuova  
Case No: 25-11895-JNP

Dear Judge Poslusny:

Please accept this letter in lieu of a more formal response to the Court's Order to Show Cause for Failure to File Missing Documents, which is returnable Tuesday, March 18, 2025, at 10:30 a.m.

Debtor has filed for Chapter 13 Bankruptcy protection five (5) times since 2019. Debtor's present case is his third filing in one (1) year. The following cases have been filed by the Debtor:

Case No.	Disposition
19-22527 JNP	<p>-Chapter 13 Petition filed on June 25, 2019, with the assistance of Jeffrey Jenkins, Esquire. Dismissed on September 17, 2019, for failure to submit documents to the Trustee and appear at the §341(a) Meeting of Creditors. Debtor submitted 1 of 3 payments to the Trustee.</p> <p>-The plan proposed \$260 per month payments for 60 months, pursued a loan modification with the mortgagee, pursued a cramdown of the 2010 Chevy Suburban (reducing interest rate and to vehicle value), and proposed 0% to timely-filed general unsecured claims.</p> <p>-Per the U.S. Bank (mortgage) proof of claim, the mortgage arrears as of June 25, 2019, were \$35,982.28.</p>
19-29156 JNP	<p>-Chapter 13 Petition filed on October 9, 2019, with the assistance of Jeffrey Jenkins, Esquire. Debtor's case was confirmed on March 4, 2021, at \$6,550 paid to date, then \$2,033 for 44 remaining months. In October 2023, Debtor became delinquent for \$7,712.92. A Stipulation was filed with the Court on November 22, 2023, adjusting plan payment. Debtor did not submit plan payment and last payment received was on August 7, 2023. The Trustee filed</p>

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	<p>a Certification of Default on November 28, 2023. No objection to the TCOD. The Court entered the Order of Dismissal on December 13, 2023.</p> <p>-Just as the prior case, this plan proposed \$260 per month payments for 60 months, pursued a loan modification with the mortgagee, pursued a cramdown of the 2010 Chevy Suburban (reducing interest rate and to vehicle value), and proposed 0% to timely-filed general unsecured claims.</p> <p>-Per the U.S. Bank proof of claim, the mortgage arrears as of October 9, 2019, were \$43,124.85.</p>
24-11254 JNP	<p>-Chapter 13 Petition filed on February 9, 2024, with the assistance of Jeffrey Jenkins, Esquire. The Court entered an Order Dismissing Debtor's Case on April 18, 2024, for failure to submit plan payment (0 of 2 payments were made), submitting documents to the Trustee, and appear at the §341(a) Meeting of Creditors.</p> <p>-This plan proposed \$200 per month payments for 2 months and then \$1,185 per month for the remaining 58 months, proposed to cure mortgage arrears and the MUA debt owed to Gloucester Township; pursued a cramdown of the 2010 Chevy Suburban (reducing interest rate and to vehicle value); and proposed 0% to timely-filed general unsecured claims.</p> <p>-Per the U.S. Bank proof of claim, the mortgage arrears as of February 9, 2024, were now \$69,622.75.</p>
24-14168 JNP	<p>-Chapter 13 Petition filed on April 24, 2024, with the assistance of Jeffrey Jenkins, Esquire. The case was dismissed on June 27, 2024, imposing a <b>180-day bar</b> for failure to make payments (1 of 2 payments were made), failure to submit documents to the Trustee to conduct the 341 hearing, and failure to resolve objection with US Bank.</p> <p>-This plan proposed \$1,431 per month payments for 60 months, proposed to cure mortgage arrears and the MUA debt owed to Gloucester Township; pursued a cramdown of the 2010 Chevy Suburban (reducing interest rate and to vehicle value); and proposed 0% to timely-filed general unsecured claims.</p> <p>-Per the U.S. Bank objection, the estimated mortgage arrears as of April 24, 2024, were \$74,598.79.</p>
25-11895 JNP	-Bare-Bones Chapter 13 Petition filed on February 25, 2025

Debtor has acted in bad faith by filing five (5) Bankruptcy Petitions since 2019. Debtor only submitted 1 payment in the prior two (2) cases. Debtor did not submit all required documents to the Trustee or submit all required pre-confirmation payments to the Trustee. The conduct of Debtor is evidence of an attempt to utilize the Court to hinder and delay payments to creditors, especially to the mortgage, US Bank and GM Financial (the vehicle finance company that the Debtor has proposed to pay since the first 2019 case).

Based on the foregoing, pursuant to 11 U.S.C. §1307(c), the Trustee respectfully requests Debtor's case be dismissed. The Trustee further requests pursuant to 11 U.S.C. §§ 105(a), 109(g), 349(a), and 1307(c) and R. 9011(c), that this Honorable Court impose on the Debtor sanctions in

the form of a 180-day bar on future filings and such other sanctions as this Court may deem appropriate to deter repetition of such conduct by the Debtor or comparable conduct by others similarly situated.

As always, please feel free to contact this office with any questions or concerns.

Respectfully submitted,

/s/ Willaim H. Clunn, III  
William H. Clunn, III, Staff Attorney for  
Andrew B. Finberg,  
Chapter 13 Standing Trustee

WHC/kt

c: Andrew G. Greenberg, Esquire (Via CM/ECF)  
Anthony J. Dinuova (Via Regular Mail)